

Compliance

Ensuring thorough compliance in line with our code of conduct.

Approaching Compliance Based on The FUJITSU Way Code of Conduct

Along with articulating the mission and values of the Fujitsu Group, *The FUJITSU Way* also includes a code of conduct stipulating the basic rules that each and every employee is expected to follow in realizing these aims. This code of conduct clearly spells out the stance of the Fujitsu Group with respect to strict observance of laws, regulations and social norms, and indicates the principles, standards, and common basic values governing our business activities.

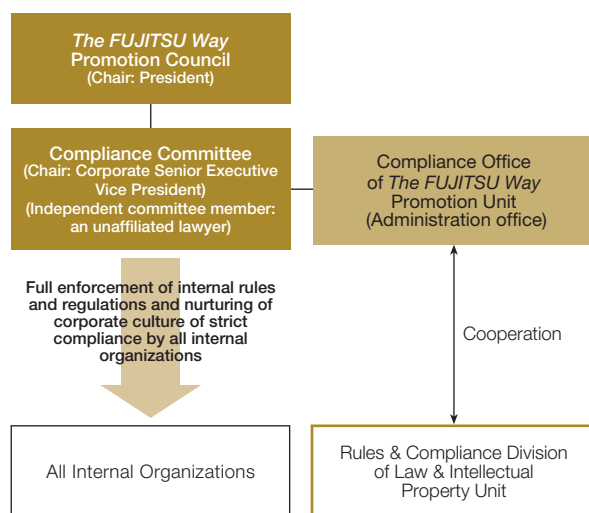
Compliance Promotion Structure

In 2004, we established the Compliance Committee under *The FUJITSU Way* Promotion Council, chaired by a corporate executive vice president and including an independent lawyer as an outside member.

Based on the stance of strict compliance with social norms indicated in *The FUJITSU Way* Code of Conduct, the Compliance Committee promotes the thorough diffusion and implementation of internal rules, the nurturing of a corporate culture of strict compliance, and the construction of necessary systems and structures.

Furthermore, we also carry out activities aimed at instilling an awareness of compliance in cooperation with the Rules & Compliance Division of the Law & Intellectual Property Unit.

Compliance Promotion Structure



The FUJITSU Way Code of Conduct

(October 2002)

The FUJITSU Way Code of Conduct indicates basic principles, standards, and shared values concerning how Fujitsu Group employees are to conduct themselves. The Code of Conduct is made up of the six tenets listed below.

- **Respect Human Rights**

We will respect the rights of every individual. Human rights are not to be infringed through sexual harassment or discrimination on the basis of race, religion, belief, sex, social status, family origin, handicap or sexual orientation. Such discrimination shall not be tolerated.
- **Comply with Laws and Regulations**

We will adhere to all applicable laws and social norms whether in Japan or overseas. Compliance shall be complete and without exception.
- **Maintain Confidentiality**

Each employee shall appropriately handle and safeguard information held within or passing through our company in accordance with its type, including company confidential information, third-party confidential information, and personal data.
- **Protect Intellectual Property**

We recognize intellectual property as an essential resource underpinning our corporate activities, fully understand the legal significance of these rights, and, on that basis, make efforts to obtain, maintain and utilize these rights. We will respect other companies' intellectual property while protecting our own.
- **Reject Unethical Behavior**

No employee shall use his or her position or role in the company for personal gain.
- **Act with Fairness in Our Business Dealings**

In our dealings with customers, business partners and competitors, we must in every case act in a manner that is fair.

Instilling an Awareness of Compliance Provision and Revision of Compliance Manual

To instill an awareness of compliance issues, we have created a compliance manual that explains, in an easily understandable manner, the main laws that closely affect our business. We have disseminated this to regular employees at Fujitsu and domestic Group companies via intranet.

This manual is revised as appropriate and covers the April 2005 revisions to the Act against Delay in Payment of Subcontract Proceeds, etc. to Subcontractors, the November 2005 revisions to the Unfair Competition Prevention Law, and the January 2006 revisions to the Anti-Monopoly Act.

Furthermore, our concern for compliance is not limited to Japanese laws: we have also produced a similar manual concerning the US Export Administration Regulations (EAR), which closely affect our global business development, to assure a thorough understanding of these issues.



Compliance manual

Implementing Compliance Education

To assure thorough compliance with laws such as Japan's new Company Law, Whistleblower Protection Act, and Anti-Monopoly Act, we hold compliance training courses for officers of Fujitsu and domestic Group companies taught by outside lawyers. We also hold internal training sessions for new managers in which instructors from both inside and outside Fujitsu talk about such issues as the importance of *The FUJITSU Way* Code of Conduct and compliance, and present typical examples that show situations that are



The FUJITSU Way small card

clear-cut as well as those where decisions are more difficult.

Furthermore, we have printed *The FUJITSU Way* on small cards and distributed them to all Fujitsu Group employees. In this way, each employee can be reminded to refer to our core principles and standards when interacting with customers or business partners, or when facing doubts about day-to-day work judgments. An English version of the small card is available for employees of overseas Group companies and foreign employees of domestic Group companies.

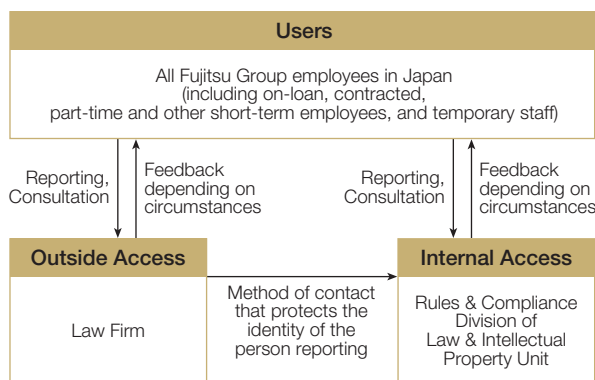
Help Line System

In September 2004, we took a further step to promote compliance with the Code of Conduct, establishing an internal help line system at Fujitsu to handle reports from employees and provide consultation.

The help line serves three purposes. It is a consultation resource for employees who, in the course of carrying out their job responsibilities, are unable to determine whether a particular action is potentially in violation of *The FUJITSU Way*. It also serves as a line of reporting for employees when they are unable to go through normal management channels. In addition, it can be used when an employee has concerns that something may violate laws or company regulations. The help line is available to all Group employees in Japan, including on-loan, contracted, part-time and other short-term employees as well as temporary staff.

In addition to this help line, we are planning to implement individual help line systems at domestic Group companies starting in fiscal 2006.

Help Line System



Compliance

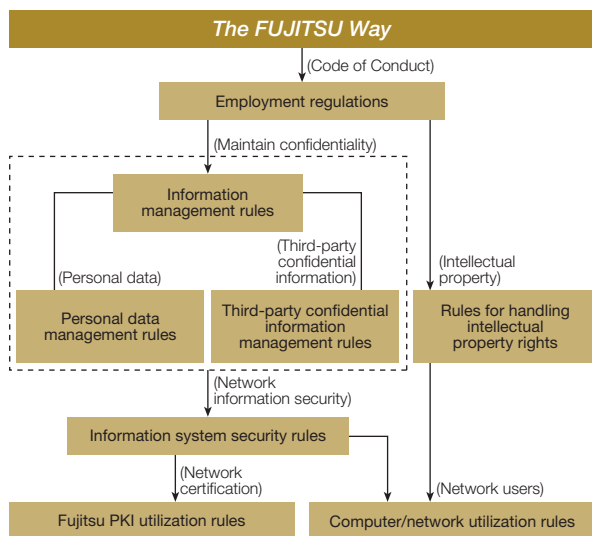
Information Security

Information Security-related Rules and Regulations

We are committed to strengthening information security, including following Japan's Personal Data Protection Law, which came into effect in April 2005, and have been pursuing a policy of promoting appropriate information management and utilization in strict compliance with internal rules and regulations.

The *FUJITSU Way* Code of Conduct clearly spells out our confidentiality policy and is the foundation of our approach to information security. We have also devised seven separate rules relating to information management, including information management rules, personal data management rules, and third-party confidential information management rules, which we are working to assure are fully observed at Fujitsu and domestic Group companies.

Rules Related to Information Management

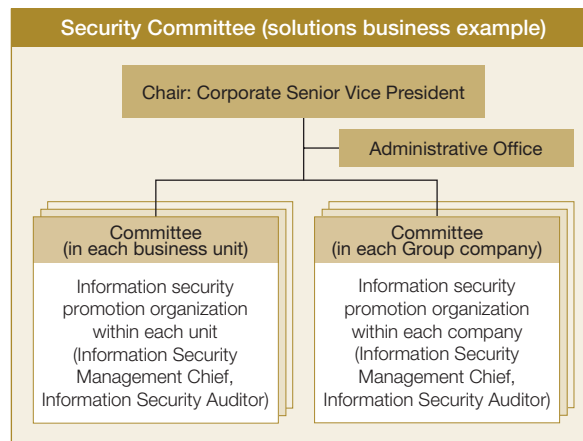


Strengthening Information Security at the Business Group Level

To assure the strongest possible information security, we are working to implement a company-wide information security management structure. As part of that effort, we are building dedicated information security management systems within each business group to promote strict information security measures that reflect the particular characteristics of each individual business.

In our solutions business, for example, we have established a Security Committee, and an Information Security Management Chief promotes a variety of information security measures, such as anti-virus measures, based on the committee's decisions. We are building a system in which an Information Security Auditor audits the way those measures are carried out.

Information Security Management Structure



Promoting ISMS and Privacy Mark Certification

In various Fujitsu business units and domestic Group companies, we are working to acquire ISMS (Information Security Management System) and privacy mark certification required for business promotion and to ensure thoroughgoing management of customers' confidential information and personal data.

Promoting Information Security Education

We are putting special effort into information security education as part of our measures to prevent information loss and leaks. In particular, we have created an "Information Management Handbook" and published it to all Fujitsu and Group company employees in Japan over our intranet. We are also implementing e-learning and face-to-face education programs in this area.

Since the Information Management Handbook was published in 2002, we have repeatedly revised it to remain up-to-date with changes in the IT world, revising it three times in fiscal 2005 alone. Our face-to-face education for Fujitsu and domestic Group company employees in this area includes making information security education part of new employee training as well as the training provided to employees when they are promoted.



Information Management Handbook

Information Security Training for Business Partners

In light of the growing number of reports of information loss and leaks, we are providing information security training not only to Fujitsu Group employees but also to employees of our business partners, such as software development and service subcontractors.

See page 36 for details of the training we provided in fiscal 2005.

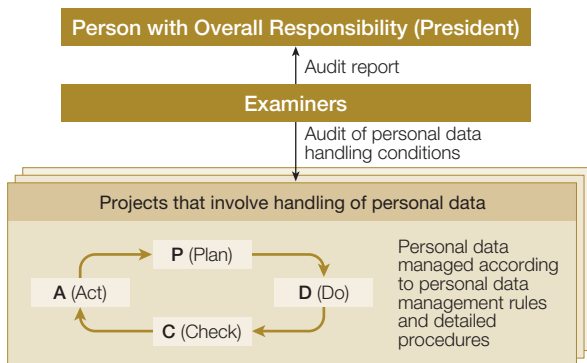
Personal Data Protection Initiatives

In addition to implementing a Personal Data Protection Policy, we have strengthened our personal data management system by stipulating Personal Data Management Rules based on Japan's Personal Data Protection Law, which came into full force in April 2005.

In particular, we provide detailed rules based on the Personal Data Management Rules for all projects that involve the handling of personal data and strive to manage personal data according to these rules. The management of personal data in individual projects is audited once a year by an auditor and is reported to the president, who has overall responsibility for personal data management.

 **Privacy**
<http://www.fujitsu.com/global/privacy/>

Personal Data Protection Management System



Protecting Intellectual Property Intellectual Property Protection Policy

The Fujitsu Group recognizes that intellectual property is a critical business asset that supports corporate activities and, in full recognition of the legal meaning of intellectual property rights, strives to acquire, secure, and make use of such rights.

For the intellectual property that we create, we take appropriate measures, including acquiring patent rights, to assure that our rights are protected legally. We also make effective use of any intellectual property rights we acquire to promote, in a stable manner, our business and R&D activities.

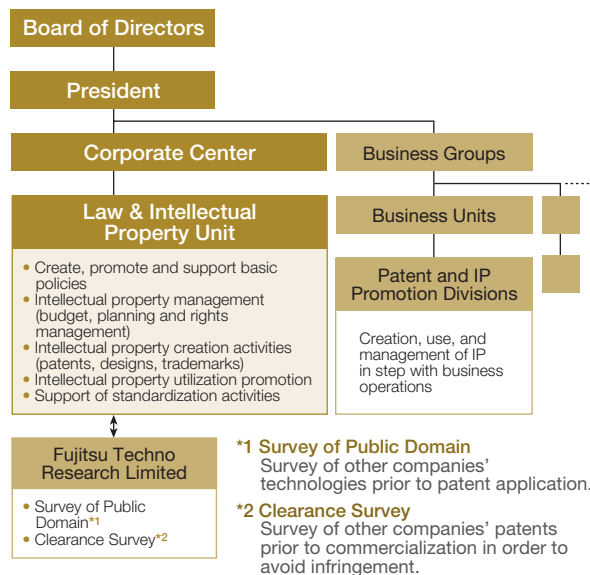
Promotion and Management Structure

The Law & Intellectual Property Unit is primarily responsible for promoting Fujitsu's intellectual property strategies. This unit proposes strategies related to the acquisition and management of intellectual property rights; handles licensing negotiations related to intellectual property rights; establishes and carries out educational activities related to internal rules; and carries out surveys and disseminates information on intellectual property issues related to Fujitsu's business.

In addition, patent & IP promotion divisions in each business unit provide specific guidance for utilizing intellectual property in day-to-day business and R&D activities.

Furthermore, we have a specialized subsidiary to handle prior patent search surveys of the public domain (to determine if a patent has already been acquired) and clearance surveys (to determine potential infringement of patents held by other companies).

Intellectual Property Strategy Promotion and Management Structure



Respecting the Patents of Other Companies

Infringing the patents of other companies would ultimately result in major problems for the Fujitsu Group and also cause serious difficulties for our customers and the markets we serve. We take great care to avoid any potential patent infringement, not only through various internal rules and procedures, but at every stage, from research and development to the point a new product or service is released, by thoroughly investigating other companies' patents. At the same time, in conformance with legal practices, we deal resolutely and swiftly with any and all infringements by other companies of Fujitsu's patent rights.